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25 **UNITED STATES DISTRICT COURT**
26 **NORTHERN DISTRICT OF CALIFORNIA**

27 CHASOM BROWN, WILLIAM BYATT,
28 JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO
individually and on behalf of all similarly
situated,

29 Plaintiffs,

30 vs.

31 GOOGLE LLC,

32 Defendant.

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62 Case No.: 4:20-cv-03664-YGR-SVK

63 **[PROPOSED] ORDER GRANTING**
64 **PLAINTIFFS' REQUEST FOR**
65 **REIMBURSEMENT OF ATTORNEYS'**
66 **FEES AND COSTS INCURRED FOR**
67 **SUCCESSFUL SANCTIONS MOTION**

68 The Honorable Susan van Keulen

1 [PROPOSED] ORDER

2 Before the Court is Plaintiffs' request for reimbursement of attorneys' fees and costs
3 incurred in bringing their motion for sanctions for discovery misconduct ("Plaintiffs' Request").
4 The Court has already found that Google committed discovery misconduct. The Court accordingly
5 issued evidentiary sanctions against Google, and the Court also concluded that "Google must pay
6 all attorneys' fees and costs incurred by Plaintiffs in filing the Sanctions Motion, including expert
7 consultant and witness fees." Dkt. 588 at 7; *see also* Fed. R. Civ. P. 37(b)(2)(c) (requiring
8 offending party to "pay the reasonable expenses, including attorney's fees, caused by the failure").

9 Therefore, the Court now **GRANTS** Plaintiffs' Request. Exhibit A to the Declaration of
10 Mark Mao filed with Plaintiffs' Request shows that Plaintiffs incurred \$1,078,924.43 in attorneys'
11 fees and costs in connection with their sanctions motion. Within one week of this Order, Google
12 must pay that amount to Plaintiffs. Plaintiffs shall provide counsel for Google with wiring
13 instructions.

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IT IS SO ORDERED.

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DATED: _____

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Honorable Susan van Keulen
United States Magistrate Judge

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